



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

APR. 3 2000

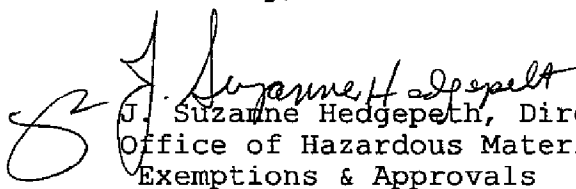
Mr. Henri Syvanen
President,
Suunto USA
2151 Las Palmas Drive Suite G
Carlsbad, California 92009

Dear Mr. Syvanen:

In response to your letters dated April 13, 2000, enclosed is a copy of the Fifth Revision of DOT-E 10677 which has been extended to January 31, 2002 for Primus, AB, Solna, Sweden.

This extension does not resolve proceedings which may be initiated by the Office of Hazardous Materials Enforcement, Research and Special Programs Administration, concerning the operations conducted between March 31, 2000 and the issue date of your extension. Those operations conducted after the expiration date and before this extension were not in compliance with the Hazardous Materials Regulations, and no longer authorized by the exemption.

Sincerely,


J. Suzanne Hedgepeth, Director
Office of Hazardous Materials
Exemptions & Approvals

Enclosure



U.S. Department
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Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

APR 13 2000

DOT-E 10677
(FIFTH REVISION)

EXPIRATION DATE: March 31, 2002

(FOR RENEWAL, SEE 49 CFR § 107.109.)

1. GRANTEE: Primus AB, Solna, Sweden
(U.S. Agent: Suunto USA, Carlsbad, CA)
2. PURPOSE AND LIMITATION:
 - a. This exemption authorizes the manufacture, marking, sale and use of a non-DOT specification nonrefillable inside container conforming with all regulations applicable to a DOT Specification 2P inner non-refillable metal receptacle, except for size, testing requirements and marking as specified herein, for the transportation in commerce of the materials authorized by this exemption. This exemption provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein.
 - b. The safety analyses performed in development of this exemption only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use or other uses not associated with transportation in commerce.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171 - 180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR §§ 178.33-2(b), 178.33-8, and 178.33-9(a)(1) as modified herein.
5. BASIS: This exemption is based on the application of Primus AB dated April 13, 2000 submitted in accordance with § 107.109.

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6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Proper Shipping Name/ Hazardous Materials Description	Hazard Class/ Division	Identi- fication Number	Packing Group
Petroleum gases, liquefied, or Liquefied petroleum gas	2.1	UN1075	N/A

7. SAFETY CONTROL MEASURES:

a. PACKAGING - Packaging prescribed is a non-DOT specification, nonrefillable inside container having a water capacity not exceeding 31.83 cubic inches, conforming to Primus-Sievert's drawings nos. 2207 16 I dated December 19, 1986, 613 93 II dated May 30, 1986 and Primus AB drawing 2210 dated March 22, 1994, and conforming to Primus-Sievert's drawings no. 2202-82 having a water capacity not exceeding 61.0 cubic inches, on file with the Office of Hazardous Materials Exemptions and Approvals (OHMEA); and meeting all requirements of §§ 173.304(d)(3)(ii) and 178.33 except as follows:

§ 178.33-2 Type and size.

* * *

(b) * * * The maximum inside diameter not to exceed 3.94 inches.

§ 178.33-7 Wall thickness.

(a) The minimum wall thickness of the body must be 0.013 inches for container with maximum inside diameter of 3.94 inches and 0.012 inches for container with maximum inside diameter of 3.52 inches.

§ 178.33-8 Tests.

(a) Five containers out of each lot of 2,500 containers or less successively produced must be pressure tested to determine the burst pressure. The containers must be complete with ends assembled. The minimum burst pressure may not be less than 240 psig.

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(b) Each 2,500 containers or less successively produced in a day must constitute a lot. These containers must be complete with ends assembled, of the same material, size, design, construction and finish. If any of the test containers in a lot fail the pressure test, that lot must be rejected, or ten additional containers selected at random from the lot may be subjected to the pressure test. Should any of the ten test containers fail the test the entire lot must be rejected.

(c) Each completed container filled for shipment must have been heated until the pressure in the container is equivalent to the equilibrium pressure of the contents at 130°F without evidence of leakage, distortion, or other defect.

§ 178.33-9 Marking.

(a) * * *

(1) Each container must be marked "DOT E-10677" instead of "DOT-2P".

* * *

8. SPECIAL PROVISIONS.

a. In accordance with the provisions of Paragraph (b) of § 173.22a, persons may use the packaging authorized by this exemption for the transportation of the hazardous materials specified in paragraph 6, only in conformance with the terms of this exemption.

b. A person who is not a holder of this exemption, but receives a package covered by this exemption, may reoffer it for transportation provided no modifications or changes are made to the package and it is offered for transportation in conformance with this exemption and the HMR.

c. A current copy of this exemption must be maintained at each facility where the package is offered or reoffered for transportation.

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d. Each packaging manufactured under the authority of this exemption must be either (1) marked with the name of the manufacturer and location (city and state) of the facility at which it is manufactured or (2) marked with a registration symbol designated by the Office of Hazardous Materials Exemptions and Approvals for a specific manufacturing facility.

e. A current copy of this exemption must be maintained at each facility where the package is manufactured under this exemption. It must be made available to a DOT representative upon request.

9. MODES OF TRANSPORTATION AUTHORIZED. Motor vehicle, rail freight, cargo vessel and cargo aircraft only.
10. MODAL REQUIREMENTS: A current copy of this exemption must be carried aboard each cargo vessel and aircraft used to transport packages covered by this exemption. The shipper must furnish a current copy of this exemption to the air carrier before or at the time the shipment is tendered.
11. COMPLIANCE. Failure by a person to comply with any of the following may result in suspension or revocation of this exemption and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
 - o All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, Parts 171-180.
 - o Registration required by § 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this exemption must receive training on the requirements and conditions of this exemption in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this exemption, including display of its number, when this exemption has expired or is otherwise no longer in effect.

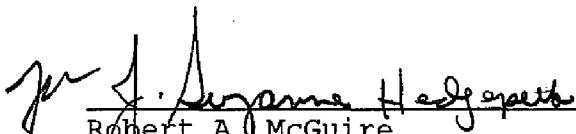
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12. REPORTING REQUIREMENTS: The carrier is required to report any incident involving loss of packaging contents or packaging failure to the Associate Administrator for Hazardous Materials Safety (AAHMS) as soon as practicable. (Sections 171.15 and 171.16 apply to any activity undertaken under the authority of this exemption.) In addition, the holder(s) of this exemption must also inform the AAHMS, in writing, as soon as practicable of any incidents involving the package and shipments made under this exemption.

Issued at Washington, D.C.:



Robert A. McGuire
Acting Associate Administrator
for Hazardous Materials Safety

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(DATE)

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Research and Special Programs Administration, Department of Transportation, Washington, D.C. 20590.
Attention: DHM-31.

The original of this exemption is on file at the above office. Photo reproductions and legible reductions of this exemption are permitted. Any alteration of this exemption is prohibited.

Copies of exemptions may be obtained from the AAHMS, U.S. Department of Transportation, 400 7th Street, SW, Washington, DC 20590-0001, Attention: Records Center, 202-366-5046.

PO: sln00